

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	Case No. 3:21-cv-00923
Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC, et al,)	
)	Jury Demand
Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

The parties, by and through the undersigned counsel and pursuant to Rule 16 of the Federal Rules of Civil Procedure, move the Court to extend the deadline for completing depositions of fact witnesses as follows:

1. The parties will complete all fact witness depositions by June 1, 2023.
2. Plaintiff's remaining fact witness depositions will be limited to former and current employees of Defendant, The Lampo Group, LLC.
3. If during the course of the remaining fact witness depositions, Plaintiff discovers third parties who have relevant information, Plaintiff may petition the Court for leave to depose those third parties.
4. Plaintiff will not seek to depose Dave Ramsey until after Defendants' Second Motions to Dismiss (Docs. #28, 30) have been resolved by the Court. If Plaintiff seeks to depose Mr. Ramsey after the Court resolves Defendants' Second Motions to Dismiss, Defendants will not oppose his deposition on the basis that fact discovery has concluded.
5. Plaintiff stipulates that he will not depose Sharon Ramsey.

6. This Joint Motion will not impact any other deadlines in this case.

Respectfully submitted,

/s/Leslie Goff Sanders

Leslie Goff Sanders (TN #18973)

Daniel Crowell (TN #31485)

Stephen Stovall (TN #37002)

BARTON LLP

611 Commerce Street

Suite 2603

Nashville, TN 37203

Telephone: (615) 340-6790

Fax: (615) 238-6762

lsanders@bartonesq.com

dcrowell@bartonesq.com

sstovall@bartonesq.com

Attorneys for Defendants

/s/Jonathan A. Street

Jonathan Street (TN #021712)

Lauren Irwin (TN #038433)

Brandon Hall (TN #34027)

Cullen Hamelin (TN #37317)

1720 West End Ave., Suite 402

Nashville, TN 37203

(615) 850-0632

street@eclaw.com

lauren@eclaw.com

bhall@eclaw.com

chamellin@eclaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that, on April 5, 2023, I caused the foregoing *Joint Motion to Extend Discovery Deadline* to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street
Lauren Irwin
Brandon Hall
Cullen Hamelin
THE EMPLOYMENT AND CONSUMER LAW GROUP

Attorneys for Plaintiff

/s/Leslie Goff Sanders
Leslie Goff Sanders (TN #18973)
Attorney for Defendants